

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

PATRICK HURD,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:17-cv-02683-RLW
)	
EXPERIAN INFORMATION)	
SOLUTIONS, INC., et al.,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT OF
DEFENDANT RESURGENT CAPITAL SERVICES L.P., CACH LLC, AND LVNV
FUNDING LLC**

Defendants Resurgent Capital Services L.P. (“Resurgent”), CACH, LLC (“CACH”), and LVNV Funding LLC (“LVNV”) (jointly “Defendants”) hereby request a 14-day extension of time in which to respond to Plaintiff’s Complaint (Doc. 4). In support of this Motion, Defendants state:

1. Defendant Trans Union, LLC removed this matter from the Circuit Court of St. Charles County (“State Court Action”) on November 6, 2017.
2. Resurgent was served with a Summons and Complaint in the State Court Action on November 2, 2017. Undersigned counsel has no evidence that CACH and LVNV have been served with the State Court Action.
3. The deadline for Resurgent to respond to Plaintiff’s Complaint is on or before December 4, 2017, absent an extension of time.
4. Undersigned counsel was recently retained and requires additional time to perform a proper investigation prior to responding to Plaintiff’s Complaint on behalf of Defendants.
5. No previous extension of this deadline has been requested.

6. No party will be prejudiced by the Court granting this extension of time.
7. Counsel for Plaintiff has consented to this extension of time.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and enlarge the time within which Defendants Resurgent, CACH and LVNV must respond to Plaintiff's Complaint to until no later than December 18, 2017.

DATED this 1st day of December, 2017.

Respectfully submitted,
SPENCER FANE LLP

By: /s/ Joshua C. Dickinson

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically with the United States District Court for the Eastern District of Missouri, this 1st day of December, 2017, with notice of case activity generated and sent electronically to all counsel of record.

/s/ Joshua C. Dickinson